



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP/TH/MJL
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 3, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to formalize its email of earlier today withdrawing its request to have Dr. Hughes opine that “perpetrators often use ‘grooming’ techniques on adult and child victims to normalize sexual behaviors and make their victims more susceptible to assault.” In light of this, the government understands that the Daubert hearing scheduled for tomorrow will be cancelled.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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cc: Clerk of Court (NGG) (by ECF) Counsel of Record (by ECF)